

In The United States District Court  
For The Southern District Of Ohio

Marvallous Keene,	)	Case No. 1:00-CV-421
	)	
Petitioner,	)	Judge Beckwith
	)	
vs	)	Magistrate Judge Merz
	)	
Betty Mitchell, Warden	)	<i>Death Penalty Case</i>
	)	
Respondent.	)	

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**Petitioner Keene's Notice of Withdrawal and Substitution of Counsel**

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Appellant Marvallous Keene notifies this Court that John Marshall and Rayl Stepter are withdrawing as his counsel. Counsel requested that the Ohio Public Defender take over Keene's case after this Court issued its final order on November 23, 2005. Kelly L. Culshaw and Pamela Prude-Smithers hereby request that they be substituted as Keene's counsel. As inferred by this Court's March 7, 2006 order, Keene is in agreement with Ms. Culshaw and Ms. Prude-Smithers assuming the role of his counsel.

Ms. Prude-Smithers has worked for well over eleven years exclusively on death penalty cases.<sup>1</sup> During this time, she has represented clients in Ohio state courts on direct appeal and postconviction review. In particular, Ms. Prude-Smithers represented Keene in his direct appeal to the Ohio Supreme Court. Ms. Prude-Smithers has also represented clients on federal habeas corpus review in both the Southern and Northern Districts of Ohio, as well as before the Sixth

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<sup>1</sup> In addition, Ms. Prude-Smithers worked as an Assistant Federal Public Defender with Federal Public Defender, Southern District of Ohio, and as a judicial law clerk for the Honorable R. Guy Cole of the Sixth Circuit Court of Appeals.

Circuit Court of Appeals She is certified under Rule 20 of the Supreme Court Rules of Practice to handle death penalty appeals in Ohio and is qualified under 848(q) to represent Keene

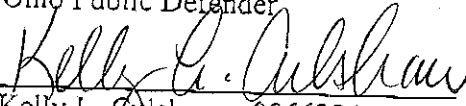
Ms Culshaw has worked for nine years exclusively on death penalty cases She has represented clients in the Ohio state courts on direct appeal and in postconviction review She has also represented clients on federal habeas corpus review in the Southern and Northern Districts of Ohio as well as the Sixth Circuit Court of Appeals She is certified under Rule 20 of the Supreme Court Rules of Practice to handle death penalty appeals in Ohio She is qualified under 848(q) to represent Keene


Respectfully submitted,

  
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Counsel for Petitioner

Certificate Of Service

This is to certify that a copy of the foregoing has been electronically filed. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Kelly L. Culshaw

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